

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

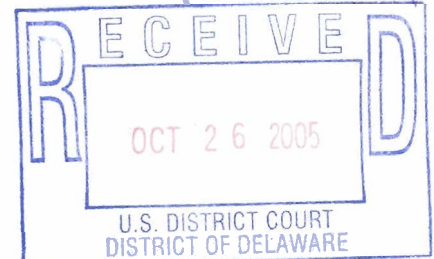
Plaintiff,

v.

KEVIN L. BELL,

Defendant.

Criminal Action No. 05-94



PETITION FOR WRIT OF
HABEAS CORPUS AD PROSEQUENDUM

Your petitioner, the United States of America, by its attorney, Christopher J. Burke, Assistant United States Attorney, with the knowledge and consent of Colm Connolly, United States Attorney for the District of Delaware, respectfully shows:

1. The defendant, who has been indicted for a violation of 18 U.S.C. § 922(g)(1), felon in possession of a firearm, is scheduled for an initial appearance before this Court on November 10, 2005, at 1:00 p.m.
2. The defendant is currently being held pending trial on related State charges and is serving jail time on unrelated charges at the Sussex Correctional Institution in Georgetown, and, therefore, must be writted out before this Court can conduct the initial appearance.

WHEREFORE, petitioner prays that the Clerk of the Court be instructed to issue a writ of habeas corpus ad prosequendum to the Warden of the Sussex Correctional Institution and to the United States Marshal for the District of Delaware to deliver Kevin L. Bell to the office of the United States Marshal on November 10, 2005, at 1:00 p.m., with the defendant being held in

federal custody until the federal charges are resolved.

COLM CONNOLLY
United States Attorney

BY: Christopher J. Burke
Christopher J. Burke
Assistant United States Attorney

Dated: October 26, 2005

IT IS SO ORDERED this 26 day of October, 2005.

Mary Pat Thyne
Honorable Mary Pat Thyne
United States Magistrate Judge